



Your business
is our business.

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

REDACTED – FOR PUBLIC INSPECTION

October 15, 2013

By Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2013 ETC Annual Report of Lackawaxen Telecommunications Services, Inc.
Study Area Code 170177**

Dear Ms. Dortch:

On behalf of Lackawaxen Telecommunications Services, Inc. (“Lackawaxen”), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.¹ Lackawaxen seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	170177
<015> Study Area Name	LACKAWAXEN TELECOM
<020> Program Year	2014
<030> Contact Name: Person USAC should contact with questions about this data	Deborah Szmyd
<035> Contact Telephone Number: Number of the person identified in data line <030>	570-685-1096
<039> Contact Email Address: Email of the person identified in data line <030>	deborah.szmyd@ltis.net

ANNUAL REPORTING FOR ALL CARRIERS			54.313 Completion Required	54.422 Completion Required
(check box when complete)				
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report				
<300> Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<310> Detail on Attempts (voice)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>	
<320> Unfulfilled Service Requests (broadband)	<input type="text"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>	
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<410> Fixed	<input type="text" value="0.0"/>			
<420> Mobile	<input type="text"/>			
<430> Number of Complaints per 1,000 customers (broadband)		<input type="checkbox"/>	<input type="checkbox"/>	
<440> Fixed	<input type="text"/>			
<450> Mobile	<input type="text"/>			
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<510> <input type="text" value="170177pa510"/>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<610> <input type="text" value="170177pa610"/>	(attached descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>	
<1010> <input type="text"/>	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>	
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	170177
<015>	Study Area Name	LACKAWAXEN TELECOM
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Szmyd
<035>	Contact Telephone Number - Number of person identified in data line <030>	570-685-1096
<039>	Contact Email Address - Email Address of person identified in data line <030>	deborah.szmyd@ltis.net
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input checked="" type="radio"/> <input type="radio"/>
	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	
<111>	year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

Name of Attached Document (.pdf)

Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

[illegible]

Page 5

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986 / OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	170177
<015>	Study Area Name	LACKAWAXEN TELECOM
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Szmyd
<035>	Contact Telephone Number - Number of person identified in data line <030>	570-685-1096
<039>	Contact Email Address - Email Address of person identified in data line <030>	deborah.szmyd@ltis.net

[illegible]

(900) Tribal Lands Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	170177
<015>	Study Area Name	LACKAWAXEN TELECOM
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Szmyd
<035>	Contact Telephone Number - Number of person identified in data line <030>	570-685-1096
<039>	Contact Email Address - Email Address of person identified in data line <030>	deborah.szmyd@ltis.net

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes,No, NA)

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	170177
<015>	Study Area Name	LACKAWAXEN TELECOM
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<030>	Contact Name - Person USAC should contact regarding this data	Deborah Szmyd
<035>	Contact Telephone Number - Number of person identified in data line <030>	570-685-1096
<039>	Contact Email Address - Email Address of person identified in data line <030>	deborah.szmyd@ltis.net

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☐

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	170177
<015>	Study Area Name	LACKAWAXEN TELECOM
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Szmyd
<035>	Contact Telephone Number - Number of person identified in data line <030>	570-685-1096
<039>	Contact Email Address - Email Address of person identified in data line <030>	deborah.szmyd@ltis.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of attached document (.pdf)

<1220> Link to Public Website

HTTP www.ltis.net

“Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	170177
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<039>	Contact Email Address - Email Address of person identified in data line <030>	deborah.szmyd@ltis.net

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)}
- <2011> 3rd Year Certification {47 CFR § 54.313(b)(2)}

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

- <2012> 2013 Frozen Support Certification
- <2013> 2014 Frozen Support Certification
- <2014> 2015 Frozen Support Certification
- <2015> 2016 and future Frozen Support Certification

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

- <2016> Certification Support Used to Build Broadband

--

Connect America Phase II Reporting {47 CFR § 54.313(e)}

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached PDF , on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.
- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	170177
<015>	Study Area Name	LACKAWAXEN TELECOM
<020>	Program Year	2014
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<035>	Contact Telephone Number - Number of person identified in data line <030>	570-685-1096
<039>	Contact Email Address - Email Address of person identified in data line <030>	deborah.szmyd@ltis.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Progress Report on 5 Year Plan

(3010)	Milestone Certification {47 CFR § 54.313(f)(1)(i)} Please check this box to confirm that the attached PDF, on line 3012, contains the required information pursuant to § 54.313 (f)(1)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	<input type="checkbox"/>
(3012)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	Name of Attached Document Listing Required Information	<input checked="" type="checkbox"/> (Yes/No)
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}		<input checked="" type="checkbox"/> (Yes/No)
(3014)	If yes, does your company file the RUS annual report Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		<input checked="" type="checkbox"/>
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input checked="" type="checkbox"/>
(3016)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	170177pa3017
(3018)	If the response is no on line 3014, Is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:		<input type="checkbox"/> (Yes/No)
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications		<input type="checkbox"/>
(3020)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,		<input type="checkbox"/>
(3022)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3023)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	170177
<015>	Study Area Name	LACKAWAXEN TELECOM
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<030>	Contact Name - Person USAC should contact regarding this data	Deborah Szmyd
<035>	Contact Telephone Number - Number of person identified in data line <030>	570-685-1096
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TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: LACKAWAXEN TELECOM	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 10/15/2013
Printed name of Authorized Officer: Deborah Beattie	
Title or position of Authorized Officer: Secretary/Treasurer	
Telephone number of Authorized Officer: 570-685-1096	
Study Area Code of Reporting Carrier: 170177	Filing Due Date for this form: 10/15/2013
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	170177
<015> Study Area Name	LACKAWAXEN TELECOM
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Deborah Szmyd
<035> Contact Telephone Number - Number of person identified in data line <030>	570-685-1096
<039> Contact Email Address - Email Address of person identified in data line <030>	deborah.szmyd@ltis.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

**Federal Communications Commission
Form 481 Annual Reporting Data Collection Form**

Line 510 Service Quality Standards & Consumer Protection Rules Compliance

Lackawaxen Telecommunications Services Inc. is compliant with the Service Quality Standards as set forth by the Pennsylvania Public Utility Commission in the Title 52 Public Utilities Chapter 63. Telephone Service Subchapter E. Telephone Quality Service Standards Section §63.

General Provisions:

- (a) A public utility shall provide telephone service to the public in its service area in accordance with its tariff on file with the Commission. The quality of service shall meet or exceed the minimum standards set forth in this subchapter.
- (b) If a public utility fails to meet a standard service surveillance level in a reporting entity as described in this subchapter, the service data for the standard not met in that reporting entity shall be filed with the Commission.
- (c) A public utility shall provide access to operator-assisted services for all exchanges at all hours.
- (d) A public utility shall provide equipment and facilities designed and engineered in accordance with realistic forecasts of customer demand and shall maintain, or have access to, a stock of associated equipment to meet the demand.

Surveillance Levels:

- (a) When the level of operation of a public utility fails to meet a stated average level of operation required by this subchapter for a period of 3 consecutive months, the public utility immediately shall:
 - (1) Initiate an investigation into the cause of the inadequate performance.
 - (2) Inform the Commission of the substandard performance and of steps, studies, and investigations commenced and undertaken by the public utility to determine the cause and to remedy the inadequate performance.
- (b) In addition to the requirements set forth in subsection (a), a public utility shall file with the Commission, within 5 working days from its initial contact with the Commission as provided for in subsection (a)(2), a report which contains the following information:
 - (1) The nature of the problem.
 - (2) The cause of the problem.
 - (3) The duration of the problem.
 - (4) The result of studies and investigations which have been taken.
 - (5) The remedial action taken.

- (c) A public utility shall monitor the stated service problem area for a period of 1 month. At the end of this 1 month period, the public utility shall file and updated state report with the Commission.

Section §63 Performance Benchmarks:

Installation of Service:

- (a) Primary Service Orders – 95% shall be completed within 5 working days unless a later date is requested or when construction is required.
- (b) Non-primary Service Orders – 90% shall be completed within 20 days unless a later date is requested.
- (c) Installation Commitments Met – 90% of commitments to applicants as to date of installation of service orders shall be met, except for applicant-caused delays, adverse weather conditions and other supervening causes beyond the utility company's control.

Trouble Reports:

- (a) Emergency Out of Service Reports – repaired within 3 hours of the reported outage consistent with the needs of customers and personal safety of the utility personnel.
- (b) Other Out of Service Reports – cleared within 24 hours, except for isolated weekend outages affecting fewer than 15 customers.
- (c) A public utility must timely notify customers of unavoidable delays and/or changes.
- (d) It shall be considered substandard performance and subject to reporting requirements for a public utility to receive more than 5.5 customer trouble reports per 100 lines per month.

Local Dial Service:

- (a) A public utility shall operate and maintain central office and interoffice channel capacity and equipment adequate to achieve the following minimum service requirements during the average busy season, busy hour:
 - (1) 98% of calls shall be provided a dial tone within 3 seconds.
 - (2) 97% of correctly dialed intraoffice calls shall be completed.
 - (3) 96% of correctly dialed interoffice calls shall be completed.

Transmission Requirements and Standards:

- (a) A public utility shall furnish, operate and maintain facilities adequate to provide acceptable transmission of communications. Transmission shall be at adequate volume levels and free of excessive distortion, noise and cross talk.
- (b) Transmission standards shall be based upon the use of telephone sets connected to a 48-Volt dial central office, measured at a frequency of 1000 Hertz (Hz).
- (c) A telephone line terminating at a customer's premises shall have a loop resistance not exceeding the operating design of the associated central office equipment.
- (d) Overall transmission loss on a customer loop shall not exceed 15 decibels.

LACKAWAXEN TELECOMMUNICATIONS SERVICES, INC.
P. O. Box 8 Rowland, PA 18457 570-685-7111

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012

Date signed: February 18, 2013

Names of Companies Covered by this Certification:

499 Filer ID

Lackawaxen Telecommunications Services, Inc.

802257

Lackawaxen Long Distance Company

802258

Name of signatory: Mark Zarambo

Title of signatory: Vice President/General Manager


I, Mark Zarambo, certify that I am an officer of the affiliated companies named above (collectively and individually "Company") and, acting as an agent of the Company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission"). *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in 2012. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with Commission rules.



LACKAWAXEN TELECOMMUNICATIONS SERVICES, INC.

Lackawaxen Telecommunications Services, Inc. 499 Filer ID 802257

Lackawaxen Long Distance Company 499 Filer ID 802258

P. O. Box 8 Rowland, PA 18457 570-685-7111

2012 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE

February 18, 2013

This statement accompanies the Company's 2012 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. See 47 C.F.R. § 64.2001 *et seq.*

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008. The Company has complied with the notice requirements for Opt-Out. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process.

6. Record of Customer CPNI Approval/Non-Approval

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

The Company has implemented procedures for compliance with Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company provides customers with on-line access to customer account information for which the Company has initiated procedures to control access in compliance with Section 64.2010(c) comprising authentication through a password established in compliance with Section 64.2010(e).

The Company has implemented password back-up authentication procedures in compliance with Section 64.2010(e).

The Company has implemented procedures to notify customers of account changes.

8. Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

<u>Not applicable.</u>	No actions taken against data-brokers.
	No customer complaints received.

9. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing

The Company has established a supervisory review process regarding its compliance with the rules for outbound marketing situations as required in Section 64.2009 (c) and (d). Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.



Description of Functionality in Emergency Situations

Lackawaxen Telecommunications services has a number of systems and procedures in place to address emergency situations as required in 47 C.F.R. § 54.313 (a)(6) {for High-cost Recipients} and 47 C.F.R. § 54.422(b)(4) {for Low-income Only Recipients} and set forth in 47 C.F.R. § 54.202(a)(2). Some of the systems and procedures that are in place are described in the following sections.

1.0 Security Systems

All Lackawaxen Telecommunications Services locations are equipped with security systems. These systems actively monitor the location for intrusion, smoke, fire, motion, high heat, and extreme cold conditions. The security systems are monitored by a centralized monitoring facility that is manned and operated 24 x 365. If the system indicates a condition at a particular site, the centralized monitoring center is authorized to directly dispatch, police or fire personnel to the affected site.

2.0 Alarm Reporting 24 X 365

Lackawaxen Telecommunications Services has an automated alarm reporting system that reports minor, major, and critical network events from all operational systems. Major and critical events are immediately reported to company personnel during regular business hours. After normal operating hours, these events are reported to a centralized monitoring facility that is operated 24 x 365. The centralized monitoring facility dispatches LTS maintenance personnel to address the condition.

3.0 Fiber Fed Remote Locations

All Lackawaxen Telecommunications Services hub and remote switching centers are interconnected using high-speed digital fiber optic transmission facilities. All site interconnection facilities run on protected optical rings and utilize one for one protected high speed components to provide the most reliable service in case of a component failure or damage to the optical cable facility.



4.0 Stand-By Battery Power Systems at All Sites

All Lackawaxen Telecommunications Services equipment sites are equipped with standby battery systems to protect against commercial power failures. These battery systems are designed to provide uninterrupted service to all of the equipment at the location for a minimum period of 8 to 10 hours. This provides sufficient time to place a portable emergency generator at the site ensuring uninterrupted service for indefinite periods.

5.0 On-Call Personnel 24 X 365

Lackawaxen Telecommunications Services has designated maintenance personnel on-call outside normal business hours. The on-call personnel's names and contact information are available to all employees. A schedule of after hour's personnel is provided to the centralized monitoring facility for dispatch purposes. On-call personnel have the ability and the authorization to contact and dispatch additional personnel if the situation warrants it.

6.0 Portable and Stationary Emergency Generators

Lackawaxen Telecommunications Services maintains five emergency generators to be used in case of commercial power failure. One generator is permanently located at the LTS switch location. Four of the generators are portable and can be used at multiple locations including the switch location. All of the LTS switching centers are equipped with connections for portable generators and configured with transfer switches to enable the entire site to be powered from the emergency generator. All generators are tested regularly to be sure that they are in good working order and always in a state of readiness. The portable generators are stored at a centralized secure location and can be moved to any LTS site using three different company vehicles. Additionally, all emergency generators undergo annual maintenance by an authorized generator service center in the fourth quarter of every year.

7.0 Spare Parts for Critical Systems

Lackawaxen Telecommunications Services maintains a complete inventory of critical spare parts for all of its primary switching and transmission systems. All spare parts are documented, clearly labeled, and located in a common, centralized location that is accessible to maintenance and management personnel. As these units are required for service they are immediately replaced with new or refurbished units so the critical spares supply is not depleted.



8.0 Spare Cable and Pole Facilities

Lackawaxen Telecommunications Services maintains an inventory of spare outside plant materials and hardware including poles, copper distribution cable, and various sizes of fiber optic transmission cables. These materials are readily available to repair damaged outside plant facilities in a variety of situations. LTS also maintains emergency fiber optic restoration splicing kits. These kits allow emergency temporary restoration of fiber optic transmission systems using mechanical splicing methods, which are typically faster to deploy, until the more permanent and typically used fusion method of splicing optical fibers can be accomplished.

9.0 Emergency Contact List

Lackawaxen Telecommunications Services maintains an up-to-date emergency contact list for use in situations where additional support personnel and/or services are required to address a particular network event. This list includes after hours contact information for both operations and management employees, network equipment manufacturers and suppliers, and a comprehensive list of contractors, that the company typically uses, that may be required in an emergency situation. These include outside plant construction and repair, electricians, carpenters, tree services, generator maintenance, commercial power contact information, etc. This list is available to all company personnel and is accessible at off-site locations.

10.0 Emergency Equipment Vendor List

Lackawaxen Telecommunications Services maintains an emergency contact list of equipment vendors and suppliers for emergency part replacement in a potential case where on-site spare parts are not sufficient to meet the size and scope of the event. This list includes all of the major equipment manufacturers that LTS uses in its network, telecommunications suppliers that provide the same or similar equipment, and aftermarket suppliers that may have an inventory, or access to an inventory, of used or refurbished equipment that is readily available.

11.0 System Backups

Lackawaxen Telecommunications Services system configuration data is backed-up on a regular basis. Back-up intervals are based on the amount of change activity on any particular system.



Backup information is stored on a dedicated server that is strictly used for this purpose. The backup server is equipped with a RAID system for reliable operation.

12.0 Off Site Data Backup for Customer and Network Information

Lackawaxen Telecommunications Services' telecommunications network is both extensive and complex. It requires a comprehensive system of records to record equipment types, network configurations, transmission routes, equipment assignments, and individual customer assigned services. Access to these records during emergency situations is critical to the swift and accurate restoral of services. LTS customer and network records are stored on multiple servers equipped with RAID storage systems and are automatically backed-up daily. These records are primarily stored at a secure location equipped with an uninterruptible power system and a permanent on-site emergency generator backup. Network records are also stored at an off-site location for additional redundancy. These records are also remotely accessible.

13.0 Sister Companies Within Pennsylvania

Lackawaxen Telecommunications Services maintains a close working relationship with a number of sister telephone companies within the state of Pennsylvania through our membership in the state association. In emergency situations where these other companies are not affected, LTS would call on these organizations as an additional line of defense for materials and/or labor requirements that exceeded our own capabilities to help address the emergency situation.

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(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	170177
<015>	Study Area Name	LACKAWAXEN TELECOM
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Szmyd
<035>	Contact Telephone Number - Number of person identified in data line <030>	570-685-1096
<039>	Contact Email Address - Email Address of person identified in data line <030>	deborah.szmyd@ltis.net
<810>	Reporting Carrier	Lackawaxen Telecommunications Services Inc.
<811>	Holding Company	LTC Communications Inc.
<812>	Operating Company	Lackawaxen Telecommunications Services Inc.

[illegible]

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LACKAWAXEN TELECOMMUNICAITONS SERVICES, INC. (SAC 170177)

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY